

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HMK ENTERPRISES, INC.,
 ROBERT ACKERMAN and
 STEVEN KAROL,

 Plaintiffs,

 v.

 FEDERAL INSURANCE
 COMPANY,

 Defendants.

Civil Action No. 04-12688-MLW

**PARTIES' JOINT STATEMENT PURSUANT TO
FED. R. CIV. P. 26(f) AND LOCAL RULE 16.1**

After conferring pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(B), Plaintiffs HMK Enterprises, Inc. (“HMK”), Robert Ackerman (“Mr. Ackerman”) and Steven Karol (“Mr. Karol”) (collectively, “the Insureds”) and Defendant Federal Insurance Company (“Federal”), pursuant to D. Mass Local Rule 16.1(D), respectfully submit this joint statement and request for scheduling conference pursuant to Local Rule 16.1(A).

1. Certifications pursuant to L.R. 16.1(D)(3) will be filed separately by the Parties.

Proposed Pretrial Schedule

2. The parties jointly propose the following discovery plan and proposed schedule for the filing of motions.

<u>Event</u>	<u>Deadline</u>
Initial Disclosures Exchanged	July 29, 2005
Fact discovery completed, including responses to all written discovery.	June 15, 2006

Plaintiffs to make disclosures pursuant to
Fed. R. Civ. P. 26(a)(2) regarding expert
witnesses, if any

July 14, 2006

Defendants to make disclosures pursuant to
Fed. R. Civ. P. 26(a)(2) regarding rebuttal
expert witnesses, if any

September 1, 2006

Expert discovery completed

October 16, 2006

Motions for Summary Judgment filed

November 30, 2006

Final Pretrial Conference

January 31, 2007 or thereafter at the
convenience of the Court

3. The parties request that the Court set a date for a scheduling conference pursuant
to Fed. R. Civ. P. 16 and 26(f) and Local Rule 16.1(A) at the Court's convenience.

Respectfully submitted,

HMK ENTERPRISES, INC., ROBERT
ACKERMAN and STEVEN KAROL,

FEDERAL INSURANCE COMPANY,

By their attorneys,

By its attorneys,

/s/ Heidi A. Nadel

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Dated: July 26, 2005.